



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

*271-A Cadman Plaza East  
Brooklyn, New York 11201*

May 22, 2024

By ECF

Honorable LaShann DeArcy Hall  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States of America v. Jonathan Goulbourne,*  
No. 22-cr-106 (LDH)

Dear Judge DeArcy Hall:

This letter is respectfully submitted to request that Your Honor adjourn the evidentiary hearing scheduled for May 23, 2023, at 11:00 a.m. in order to allow for the engagement of independent counsel for the witnesses directed to appear. This is the second request for an adjournment made on behalf of the Metropolitan Detention Center. Your Honor granted the adjournment from May 8 to May 23, 2024. This request does not affect any other scheduled dates concerning this hearing. Counsel for Mr. Goulbourne has consented to this request.

The reason for this request is that after additional review, it has been determined today that representation in accordance with 28 C.F.R. §§ 50.15–50.16 will be provided to the witnesses in the form of private counsel at Department of Justice expense. The representation would be with respect to the matters that are the subject of the Court's show cause order. The Department of Justice is taking all appropriate steps to put representation in place. As of the filing of this request, the Department has notified the Federal Bureau of Prisons that private counsel at the Department's expense has been authorized, and is currently obtaining and circulating a list of private attorneys for the individual witnesses to consider. While this process cannot be completed by tomorrow, we propose filing a letter to update the Court on the status of representation for the witnesses on or before May 29, 2024.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

BREON PEACE  
UNITED STATES ATTORNEY

By: *s/Richard K. Hayes*  
RICHARD K. HAYES  
Assistant U.S. Attorney  
(718) 254-6050  
[richard.hayes@usdoj.gov](mailto:richard.hayes@usdoj.gov)  
DARA A. OLDS  
Assistant U.S. Attorney  
(718) 254-6148  
[dara.olds@usdoj.gov](mailto:dara.olds@usdoj.gov)  
KATHLEEN A. MAHONEY  
Assistant U.S. Attorney  
(718) 254-6026  
[kathleen.mahoney@usdoj.gov](mailto:kathleen.mahoney@usdoj.gov)

cc: By email  
Counsel of Record